

**Responses to EPA April 24, 2015 Comments  
on the April 20, 2015 Revision of the  
Work Plan Addendum for the Phase 1D Investigation**

- 1) Page 5, Field Investigation and Sample Collection and Analysis, first paragraph, Item 6 – Though intuitive, please add text to clarify the purpose for collection of TAL metals and Sulfate, Carbonate and Fluoride and reference its utility/inclusion on page 8 (i.e., multiple lines of evidence approach for RIM/non-RIM radionuclide determination).

**Response:** *To be prepared based on information to be provided by Cotter*

- 2) Page 7, Field Investigation and Sample Collection and Analysis, first paragraph, last sentence – This sentence states: “To the extent that significant additional work beyond possibly one or more additional GCPT investigation locations and/or additional Sonic borings is envisioned, an additional addendum to the work plans will be prepared and submitted to the EPA for review and approval.” Please note that it is EPA’s understanding and intent that this fieldwork mobilization will complete RIM characterization between Area 1 and the former North Quarry, which is adequately referenced earlier in the document and for which EPA concurs. The document also provides sufficient details to address and coordinate field changes with EPA representatives if additional sampling points during fieldwork are determined to be necessary without a need for additional work plan addendums. If the field situation changes that warrants use/mobilization of some other type of drilling equipment, or any associated delay are caused to mobilize or prepare for this equipment, EPA would expect it can coordinated without an extensive document amendment (i.e., field change) and through the methods of communication outlined previously to minimize fieldwork delays. Please modify the document accordingly.

**Response:** *The reference to a possible additional addendum to the work plan has been removed.*

- 3) Pages 7 and 8, Reporting – EPA concurs with the submittal of the initial Phase 1D data investigation report referenced on page 7 and for delivery 30 days after completion of fieldwork efforts (i.e., 4 weeks). This data report could also include the additional data collected at Areas 1 and 2, per EPA’s April 20, 2015 letter; assuming that work is accepted and defined following the next technical meeting between EPA and RPs technical representatives. If inclusion within this document is problematic, then the remedy related part can be a separate data deliverable but should be submitted to EPA within the same 30 day delivery date as identified for the IB related data deliverable.

**Response:** *It is the Respondents’ preference, and from EPA’s correspondence it appears to be EPA’s preference, that both additional investigations (Phase 1D and the additional Area 1*

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*and 2 investigation) be performed as part of single field effort with one mobilization and one resulting report. To the extent that the additional investigation of Areas 1 and 2 is performed as part of a continuous field effort in conjunction with the Phase 1D investigation, one combined data summary report can be prepared. The schedule for such a report will be developed and included in the work plan addendum for the additional Area 1 and 2 investigation. If a single data summary report cannot feasibly be prepared (i.e., the work is performed in such a manner that preparation of individual data summary reports would be appropriate), we would expect that the data summary report for the Additional Area 1 and 2 investigation would be prepared and submitted to EPA within four weeks of completion of the field investigation (Please note that per the Phase 1D work plan addendum, the term “completion of the field investigation” is defined as completion of the drilling and sampling, laboratory analyses, data validation and data summarization/presentation tasks, not the completion of actual on-site field work). Regardless of whether a single or separate data summary reports are prepared, a single comprehensive interpretative report that presents the evaluation of the Phase 1D investigation, the additional Area 1 and Area 2 investigation, and the results of all of the prior investigations (e.g., the NRC, RI and Phase 1 investigations) would be prepared.*

- 4) The “comprehensive report” first referenced on page 7 and then detailed on page 8 is also acceptable with regards to calculations for RIM in Area 1. Therefore, EPA also concurs with the second “comprehensive” report submittal that includes all historical RIM investigation work at Area 1 with relevance to the Isolation Barrier Decision. For simplicity and to minimize cost, the first data deliverable (Phase 1D) and Phase 1 comprehensive report can be combined, as EPA expects to receive routine data during fieldwork from the weekly and monthly reports and as validated/tabulated analytical data becomes available.

**Response:** *We appreciate EPA’s offer of flexibility with respect to the number and content of the deliverables. At this time we believe it would be best to prepare an initial field investigation data summary report(s) that can be used as the basis for preparation of a more comprehensive interpretive report, but we will continue to evaluate this approach as we develop the data and, if feasible, work toward the preparation of a single deliverable.*

- 5) In addition, however; and separate from the IB related characterization, once all RIM investigation work is complete at OU1 (both areas 1 and 2) and other relevant remedy information has been evaluated (i.e., pyrolysis, risk evaluation refresh, radon flux, etc.), EPA will require an RI addendum, as this is relevant to the final remedy decision process. That document should capture all work that updates the original RI findings and then provide information to support and amend the revised Supplemental Feasibility Study, along with inclusion of the six remedy evaluation deliverables. EPA and the responsible parties can discuss this RI addendum, its contents and delivery at the next technical meeting as it is not specifically necessary for fieldwork to proceed for the Phase 1D RIM characterization effort. Please modify the document accordingly for clarity.

**Response:** *We understand the need to integrate all of the new data with the prior data and prepare an updated understanding of the nature and extent of the radionuclide occurrences in Areas 1 and 2 and look forward to discussing the specific content and scope of this report with EPA. The work plan has been amended to identify the comprehensive interpretive report as the ultimate deliverable from this effort.*

- 6) Page 9, Schedule – The first paragraph that starts “The above schedule is estimated and subject to change...” EPA understands that any schedule is an estimate based on best available information and subject to change due to unforeseen events. The document also clearly establishes a valid process for good communication with the EPA RPM/OSC and through routine reporting that should address any such changes without the need for disclaimer. Please delete this paragraph, accordingly.

**Response:** *We accept that EPA understands the nature of an estimated schedule and the potential issues that may arise that could affect the actual schedule for the work. However, we also recognize that personnel changes occur and that other parties will review this work plan addendum and may not understand the potential for changes in the schedule. Therefore, we believe that the language regarding the basis used to develop (and the uncertainties associated with) the actual forecasted schedule dates should be retained. However, we have revised the Addendum to include language indicating that any potential changes to the schedule will be discussed with EPA and if appropriate a written request for a change in schedule will be submitted for EPA review and approval.*

- 7) Page 9, Schedule, last sentence – Please amend this sentence to read “It is anticipated that preparation of the comprehensive Phase 1 investigation report will be submitted to EPA no later than 60 days after submittal of the Phase 1D investigation report.” Also include both the Phase 1D investigation report and comprehensive Phase 1 investigation report within the above activity list, with their respective submittal dates, if separate. If the reports are combined, per comment 2 above, identify the appropriate delivery time for this document in the schedule.

**Response:** *The schedule presented in the work plan addendum has been revised in accordance with this comment.*

Table 1: Summary of Elevation Data and Anticipated Depth of the Proposed Phase 1D Borings

Boring	Northing	Easting	1971 Elevation	1975 Elevation	1979 Design Elevation	2014 Elevation	Minimum of 1971, 1975, 1979 Elevations	Anticipated Depth of Boring
1D-1	1,069,084.94	515,745.70	457.5	454.9		462.2	454.9	7.3
1D-2	1,068,998.58	515,777.22	462.1	445.3		466.6	445.3	21.3
1D-3	1,068,972.45	515,874.51	444.2	463.9		471.5	444.2	27.3
1D-4	1,068,793.50	516,091.90	434.0	449.0	467.2	496.3	434.0	62.2
1D-5	1,068,649.79	516,038.76	431.6	438.9	457.7	486.1	431.6	54.5
1D-6	1,068,729.80	516,151.73	431.6	447.8	458.6	510.9	431.6	79.3
1D-7	1,068,645.80	516,152.49	441.3	437.5	451.4	511.3	437.5	73.8
1D-8	1,068,818.90	516,241.96	431.6	456.2	460.7	516.4	431.6	84.7
1D-9	1,068,668.89	516,214.42	440.2	438.7	450.1	519.1	438.7	80.4
1D-10	1,068,897.82	516,307.30	431.6	464.9	463.7	503.4	431.6	71.8
1D-11	1,068,732.16	516,318.69	431.6	439.1	449.7	521.7	431.6	90.1
1D-12	1,068,879.49	516,446.50	431.6	444.1	445.8	505.5	431.6	73.9
1D-13	1,068,808.45	516,404.51	431.6	443.6	450.4	519.5	431.6	87.9
1D-14	1,068,737.78	516,389.12	440.5	439.3	447.0	521.6	439.3	82.3

**Notes:**

- 1) The 1971 Elevation was determined from a March 12, 1971 topography developed by Surdex Corporation from historical aerial photogrammetry.
- 2) The 1975 Elevation was determined from an April 6, 1975 topography developed by Surdex Corporation from historical aerial photogrammetry.
- 3) The 1979 Elevation was determined by a surface provided by Aquaterra to represent the bottom of the fill - its methodology of determination is unknown.
- 4) The 2014 Topography was determined from an aerial topography from Cooper Aerial. Date of flyover March 12, 2014.
- 5) Elevations are for the ground surface in units of feet above mean sea level (amsl).
- 6) Boring depths are in feet below ground surface (bgs)



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